

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

In the Matter of the Denial of Federal  
Firearms Application/Renewal, FFL No.  
1-56-03195, Pursuant to Chapter 44, Title  
18, United States Code, As a Dealer in  
Firearms Other Than Destructive Devices

Licensee:  
Blackwood Station Outfitters, Inc.  
5670 N US 15-501  
Pittsboro, North Carolina 27312

Case No.: 1:25-cv-245

PETITION  
FOR DE NOVO JUDICIAL REVIEW

NOW COMES Blackwood Station Outfitters, Inc., Petitioner, by and through the undersigned counsel, who hereby requests that this Court grant a de novo review hearing of the denial of federal firearms application/renewal, 1-56-03195 (“FFL”), pursuant to 18 U.S.C. § 923(f)(3), and in support thereof, Petitioner shows unto the Court as follows:

1. Petitioner is a North Carolina Corporation with its principal place of business and registered mailing address at 5670 US 15-501 North, Pittsboro, Chatham County, North Carolina 27312.
2. Petitioner operates a sporting goods store located at 5670 US 15-501 North, Pittsboro, Chatham County, North Carolina 27312.
3. Petitioner holds federal firearms license number 1-56-03195 (“FFL”) as a dealer in firearms other than destructive devices.
4. Petitioner’s FFL was due to expire on 1 October 2024.
5. On 31 July 2024, Petitioner submitted a timely renewal application for its FFL.

6. On 15 August 2024, the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) issued a Notice to Deny Application for FFL, ATF Form 5300.43 and Petitioner timely requested a hearing to review the Notice to Deny Application.

7. On 6 November 2024, a hearing was held at the ATF Raleigh Field Division Office.

8. On or about 27 January 2025, the ATF denied Petitioner’s Application to Renew its FFL pursuant to 18 U.S.C. § 923(d) and 27 C.F.R. § 478.71. (Exhibit 1)

9. On or about 27 January 2025, Regina Milledge-Brown, Director of Industry Operations, sent the Final Notice of Denial of Application, Revocation Suspension and/or Fine of Firearms License and its Findings of Fact and Conclusions of Law (“Notice”) via USPS Certified Mail, tracking number 9589071052702396651924.

10. On or about 18 February 2025, Notice was delivered to Petitioner, effecting service of the Notice.

11. Pursuant to 18 U.S.C. § 923(f)(3), Petitioner may petition the United States District Court for the district in which it has its principal place of business for a de novo judicial review of the revocation of its FFL.

12. Further, pursuant to 18 U.S.C. § 923(f)(3), the District Court may consider any evidence submitted at the de novo review regardless of whether such evidence was considered at the agency hearing.

**WHEREFORE**, Petitioner respectfully requests that the United States District Court for the Middle District of North Carolina allow Petitioner to exercise his rights under 18 U.S.C. Chapter 44 and to hold a de novo judicial review the revocation of its FFL at a time convenient to all parties and the Court.

This the 28 of March 2025.

**Landon White Law Firm, PLLC**

/s/ D. Landon White

D. Landon White

N.C. Bar. No. 45120

887 Washington Street, Ste A

Raleigh, NC 27605

PO Box 6696

Raleigh, NC 27628

Email: [lwhite@landonwhitelaw.com](mailto:lwhite@landonwhitelaw.com)

Telephone: 919-745-8060

Facsimile: 919-750-0068

*Attorney for Petitioner*

## CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing Petition for De Novo Judicial Review with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

United States Attorney's Office – Middle  
District of North Carolina  
101 South Edgeworth Street, 4th Floor  
Greensboro, NC 27401  
Telephone: 336-333-5351  
E: [USANCM.Webmaster@usdoj.gov](mailto:USANCM.Webmaster@usdoj.gov)  
*Attorney for Respondent*

Regina Milledge-Brown  
Director of Industry Operations  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives  
3600 Arco Corporate Drive, Suite 500  
Charlotte, NC 28273  
E: [cathy.hunter@atf.gov](mailto:cathy.hunter@atf.gov)  
*Respondent*

Ms. Pamela Bondi  
United States Department of Justice  
950 Pennsylvania Avenue NW  
Washington, D.C. 20530

Civil Process Clerk  
United States Attorney's Office for the  
Middle District of North Carolina  
101 South Edgeworth Street, 4th Floor  
Greensboro, NC 27401

This the 28 of March 2025.

**Landon White Law Firm, PLLC**

/s/ D. Landon White  
D. Landon White  
N.C. Bar. No. 45120  
887 Washington Street, Ste A  
Raleigh, NC 27605  
PO Box 6696  
Raleigh, NC 27628  
Email: [lwhite@landonwhitelaw.com](mailto:lwhite@landonwhitelaw.com)  
Telephone: 919-745-8060  
Facsimile: 919-750-0068  
*Attorney for Petitioner*